REMARKS

Claims 1-19 and 21-22 of the application stand rejected. Claims 19, 21 and 22 have been canceled herein without prejudice to the filing of continuations and/or divisionals. Applicants respectfully request reconsideration of pending Claims 1-18 in light of the remarks herein.

35 U.S.C. §103(a)

Claims 1-19 and 21-22 stand rejected under 35 U.S.C. §103(a) as unpatentable over Cheng et al. U.S. Patent Application Pub. No. 2003/0037055 (hereafter "Cheng") in view of Banning et al. (U.S. Patent No. 5,421,008, hereafter "Banning"). Additionally, Claim 10 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Cheng in view of Banning in further view of Hsu. The Examiner submits that Cheng teaches all but a couple of the elements in these claims, and that Banning and Hsu teach the remaining element. As a result, the Examiner submits that Cheng in combination with Banning and Hsu render Claims 1-19 and 21-22 unpatentable. Applicants respectfully traverse the Examiner's rejections.

First and foremost, Claims 19, 21 and 22 have been canceled herein without prejudice to the filing of continuations and/or divisionals and rejections to these claims are moot. With respect to remaining Claims 1-18, Applicants respectfully submit that Cheng simply does not teach any of the elements as contended by the Examiner. Cheng describes "Large Database Searching Using CAM and Hash" i.e., a system for searching a hash based content associative memory. The claimed invention is directed to a user interface that explains search logic and results to a user. Cheng does not describe anything resembling a user interface, so Applicants respectfully submit that it is impossible for Cheng to teach the claimed elements suggested by the Examiner. For example, the Examiner states that Cheng teaches a computer implemented method and corresponding system for explaining search logic and results. Cheng does not teach generating a user interface at all and as a result, there is no user interface in Cheng to "explain" the search logic and results.

Unsurprisingly, Cheng also does not describe the element previously added to independent Claims 1, 8 and 11, namely "generating a user interface that explains to a user the machine's search logic and results". Again, Cheng does not teach or suggest a user interface. The Examiner makes no showing of where in Cheng this element is taught (it is not), neither does the Examiner make any attempt to discuss how Cheng "explains" the user interface (it does not). Applicants therefore respectfully submit that at least for this reason, Cheng (in combination with any other reference) simply does not render independent Claims 1, 8 and 11 (and all dependent claims) unpatentable.

Later in the Office Action, when addressing the Applicants' previously submitted remarks that Cheng does not teach or suggest the element of "generating a user interface that explains to a user the machine's search logic and results", the Examiner confusingly states instead that Banning teaches such a system. The Examiner points to Banning Col. 2, lines 31-46 for the entirety of support for the statement. Applicants respectfully submit that this section of Banning simply does not teach the claimed element. This section of Banning reads as follows:

> "Accordingly, it is a primary object of the present invention to provide a user with graphical, query software to directly manipulate a database.
>
> These and other objects of the present invention are accomplished by the operation of an algorithm in the memory of a processor. The processor accesses data structures to determine the current status of a database and displays the logical relationships of the information stored in the database graphically. A user employs a pointing device to select and change portions of the database and its logical relationships via the graphic user interface. The selection and changes are dynamically applied to the relational database via modifications to the underlying data structures and reflected graphically on the display."

Applicants respectfully submit this nothing in this section may be construed as "generating a user interface that *explains to a user the machine's search logic and results*" as claimed. Banning merely discusses a graphical scheme to manipulate a database. The Examiner makes no further explanation for the leap from this section of Banning to the claimed element and Applicants respectfully submit that such a leap simply cannot be made because Banning simply does not explain anything.

Applicants respectfully reiterate that read in its entirety, the claimed invention is directed to a method and system for explaining search logic and results. As described in the specification:

> "A system model is a collection of data and control concepts used in the software running on the computer device, such as a search profile. The presentation component creates a presentation 308 of a presentation model relating the system model to one of the search results 306. **The presentation model is a way of envisioning the process of executing the search, which is how the computing device does the search, how the user conceptualizes the search, or some combination in between the two.**" ...

> For example, a user may select one or more documents as search input elements 302 as part of a search request. The computer system 300 takes the input documents and produces a list of similar, relevant documents as search results 306 using the system model. The list of similar, relevant documents is part of the presentation 308 on a computer display. The computer system produces a presentation model explaining how the search input elements lead to the search results by way of a list of key words selected from the input documents ranked in order of importance and frequencies of how often the key words appeared in both the input documents and the resulting documents. The presentation model also has words from the input documents that were not used in producing the results. The presentation 308 is a computer display showing the presentation model to the user in a manner that facilitates understanding. The presentation 308 allows the user to view the input documents and resulting documents with the key words highlighted. In this way, the user has visibility into the inner workings of the search, which permits the user to be more efficient and intelligent in conducting searches.

(Specification, Paragraphs 18 and 19, emphasis added).

Nothing in Banning teaches the claimed elements of this method and system. Additionally, Cheng does not teach or suggest the remaining elements of the claims, as suggested by the Examiner.

In conclusion, Applicants respectfully reiterate that, as discussed in detail above, Cheng and/or Banning does not teach any of the claimed elements of independent Claims 1, 8 and 11. As a result, the combination (with or without the addition of Hsu) fails to render Claims 1, 8 and 11 (and all dependent claims) unpatentable. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 1-18 under 35 U.S.C. §103.

CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-18 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (714) 730-8225.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,

Dated: January 10, 2008.   /Sharmini N. Green, Reg. No. 41,410/
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                                  Margaux Rodriguez   _January 10, 2008_